

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ALABAMA
SOUTHERN DIVISION

16-cv-1 A 901
U.S. DISTRICT COURT
N.D. OF ALABAMA

BENJAMIN F. MERCER {
 {
Plaintiff, {
 { Case No.: 2:16-cv-01204-RDP
v. {
 {
STATE OF ALABAMA DEPARTMENT OF {
TRANSPORTATION {
 {
Defendant

Amended Complaint

I am a Black/Africa-American individual. I was previously employed by the Department of Transportation.

I was wrongfully terminated. I file a charge of racial discrimination with the EEOC. The EEOC found that the State of Alabama, Department of Transportation had committed a violation of the Title VII of the Civil Rights Act of 1964, as amended. The Department of Justice issued me the right to sue on April 23, 2016,

on June 13, 2016, I was hired by Serco Inc, as a Traffic management Operator. I perform my job in a satisfactory manner. Serco Inc, is a government contractor which serves Alabama Department of Transportation (ALDOT). I filled a suit against ALDOT on August 12, 2016 in Federal District Court. On August 17, 2016, I was informed by my supervisor David Spinney with Serco Inc, that I was being on administrative leave due to an issue in my record. On August 19, 2016, my supervisor David Spinney with Serco Inc, told me that ALDOT had put us in a tough situation and that I was being terminated. I had no disciplinary action or any unsatisfaction on performance in my file. I requested a reason for termination and I was informed that Serco Inc, did not give out termination letter. The Department of Transportation has indefinitely suspended and/or withheld my vocational ALDOT certifications since I filed my initial charge. I believe I have been retaliated against due to my prior participation in a protected activity in violation of Title VII of the Civil Rights Act of 1964, as amended.

I was hired by Serco Inc, on June 13, 2016, as a Traffic Management Operator. I perform my job in a satisfactory manner with no disciplinary or performance complaint. My supervisor David Spinney informed me on August 17, 2016, that I was being put on administrative leave with pay until the situation is being investigated, on August 19, 2016, my supervisor David Spinney with Serco Inc, informed me that I was being terminated. I believe that I have been retaliated

against because of my previous participation in a protected act of Title VII of the Civil Right Act of 1964, as amended.

Benjamin Mercer

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702 Narragansett Drive

Birmingham, Al 35214

(205) – 249-5567